

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY LLC, et al., Debtors.¹	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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**NOTICE OF AGENDA OF MATTERS SET FOR
HEARING ON SEPTEMBER 14, 2020 AT 1:30 P.M. (CST)**

The above-referenced debtors and debtors in possession (collectively, the “**Debtors**”) hereby file their Agenda of Matters Set for Hearing on **September 14, 2020 at 1:30 p.m. (CST)** before the Honorable Marvin Isgur.

1. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 22)**

Status: This matter is going forward on a contested basis.

Responses:

- A. Limited Objection of Certain Texas Taxing Entities to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(d)(1), and 364(e) and (B) To Utilize Cash Collateral Pursuant to 11 U.S.C. 353, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. § 361, 362, 363, 364, and 507(b) and (III) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

(ECF No. 188)

- B. Bedrock Petroleum Consultant, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 192)
- C. CETCO Energy Services Company, LLC's Response to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 196)
- D. Joinder and Reservation of Rights of Certain Trade Creditors to Bedrock Petroleum Consultants, LLC's Limited Objection (ECF No. 200)
- E. Joinder in Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 201)
- F. Objection of Cypress-Fairbanks ISD, Galveston County, Harris County, Lavaca County, Live Oak CAD, Matagorda County, Rio Grande City CISD, Starr County to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 202)
- G. Joinder and Reservation of Rights regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 203)
- H. Joinder and Reservation of Rights of Partco, LLC to Bedrock Petroleum Consultants, LLC's Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 205)
- I. Limited Objection and Reservation of Rights of Ecopetrol America LLC to Emergency Motion of Debtors for Interim and Final Orders Authorizing Debtors to Obtain Postpetition Financing (ECF No. 206)
- J. Joinder and Reservation of Rights of Acadian Contractors, Inc. to Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 211)
- K. CETCO Energy Services Company, LLC's Amended and Restated

Response to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 212)

- L. Joinder and Reservation of Rights of Broussard Brothers, Inc. to Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 213)
- M. Joinder and Reservation of Rights Regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 216)
- N. Joinder and Reservation of Rights Regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 218)
- O. Joinder and Reservation of Rights Regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion (ECF No. 222)
- P. Louisiana Safety Systems, Inc.'s (A) Joinder and Reservation of Rights Regarding Bedrock Petroleum Consultants, LLC's Reservation of Rights and Limited Objection to DIP Financing and Cash Collateral Motion, and (B) Partial Joinder Regarding Amended and Restated Response to DIP Financing and Cash Collateral Motion (ECF No. 230)
- Q. C-Dive, L.L.C.'s Limited Response to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) claims, and (II) Granting Related Relief (ECF No. 284)

Related Documents:

- A. Declaration of John-Paul Hanson in Support of Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 23)
- B. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions

and First Day Relief (ECF No. 29)

- C. Affidavit of James Mapplethorpe Regarding First Day Motions, Orders, Prime Clerk Retention Application, Application for Designation as a Complex Chapter 11 Case, Emergency Consideration Request, Notice of Agenda, and Declaration of John-Paul Hanson and Michael Dane (ECF No. 44)
 - D. Interim Order (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) (ECF No. 58)
 - E. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)
 - F. Order Continuing the Hearing on the Motions (ECF No. 221)
 - G. Affidavits of Service for Mailings for the Period from August 16, 2020 through August 21, 2020 (ECF No. 268)
 - H. Stipulation and Consent Further Extending the Deadline for the Official Committee of Unsecured Creditors to Object to Certain Motions (ECF No. 312)
 - I. Witness and Exhibit List Filed by the Official Committee of Unsecured Creditors (ECF No. 317)
 - J. Debtors' Witness and Exhibit List for Hearing on September 14, 2020 (ECF No. 318)
2. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Programs and the Surety Bond Program, and (B) Pay Certain Obligations With Respect Thereto; (II) Granting Relief From Automatic Stay With Respect to Workers Compensation Claims; and (III) Granting Related Relief (ECF No. 4)**

Status: This matter is going forward on a contested basis.

Responses:

- A. JX Nippon Oil Exploration (U.S.A.) Limited's Objection to Motion of Debtors for Final Order (I) Authorizing Debtors to (A) Continue Insurance Programs and the Surety Bond Program, and (B) Pay Certain Obligations with Respect Thereto; (II) Granting Relief from Automatic Stay with

Respect to Workers Compensation Claims; and (III) Granting Related Relief (ECF No. 189)

- B. Informal comments received by multiple surety providers

Related Documents:

- A. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- B. Affidavit of James Mapplethorpe Regarding First Day Motions, Orders, Prime Clerk Retention Application, Application for Designation as a Complex Chapter 11 Case, Emergency Consideration Request, Notice of Agenda, and Declaration of John-Paul Hanson and Michael Dane (ECF No. 44)
- C. Interim Order (I) Authorizing Debtors to (A) Continue Insurance Programs and the Surety Bond Program, and (B) Pay Certain Obligations With Respect Thereto; (II) Granting Relief from Automatic Stay With Respect to Workers' Compensation Claims; and (III) Granting Related Relief (ECF No. 152)
- D. JX Nippon Oil Exploration (U.S.A.) Limited's Witness and Exhibit List for Hearing Scheduled for 1:30 P.M. on August 24, 2020 (ECF No. 190)
- E. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- F. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)
- G. Order Continuing the Hearing on the Motions (ECF No. 221)
- H. Affidavits of Service for Mailings for the Period from August 9, 2020 through August 15, 2020 (ECF No. 267)
- I. Affidavits of Service for Mailings for the Period from August 16, 2020 through August 21, 2020 (ECF No. 268)
- J. Witness and Exhibit List filed by JX Nippon Oil Exploration (U.S.A.) Limited (ECF No. 316)
- K. Witness and Exhibit List filed by The Official Committee of Unsecured Creditors (ECF No. 317)
- L. Debtors' Witness and Exhibit List for Hearing on September 14, 2020 (ECF No. 318)

3. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, and (D) Continue Utilizing Corporate Credit Cards; and (II) Granting Related Relief (ECF No. 6)**

Status: This matter is going forward on a contested basis.

Responses:

- A. Limited Objection And Reservation Of Rights Of The Official Committee Of Unsecured Creditors To The Debtors Emergency Motion For Interim And Final Orders (I) Authorizing The Debtors To (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, And (D) Continue Utilizing Corporate Credit Cards; And (II) Granting Related Relief (ECF No. 311)

Related Documents:

- A. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- B. Affidavit of James Mapplethorpe Regarding First Day Motions, Orders, Prime Clerk Retention Application, Application for Designation as a Complex Chapter 11 Case, Emergency Consideration Request, Notice of Agenda, and Declaration of John-Paul Hanson and Michael Dane (ECF No.44)
- C. Interim Order (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, and (D) Continue Utilizing Corporate Credit Cards; and (II) Granting Related Relief (ECF No. 49)
- D. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- E. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)
- F. Order Continuing the Hearing on the Motions (ECF No. 221)
- G. Affidavits of Service for Mailings for the Period from August 16, 2020 through August 21, 2020 (ECF No. 268)
- H. Stipulation and Consent Further Extending the Deadline for the Official Committee of Unsecured Creditors to Object to Certain Motions (ECF No. 312)

- I. Witness and Exhibit List Filed By The Official Committee of Unsecured Creditors (ECF No. 317)
 - J. Debtors' Witness and Exhibit List for Hearing on September 14, 2020 (ECF No. 318)
 - K. Notice of Filing Revised Proposed Final Order (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (II) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, and (D) Continue Utilizing Corporate Credit Cards; and (II) Granting Related Relief (ECF No. 330)
4. **Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief (ECF No. 7)**

Status: This matter is going forward on a contested basis.

Responses:

- A. CETCO Energy Services Company, LLC's Response to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief [P-7] and ii. Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C. §§105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. §363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing Pursuant to Bankruptcy Rules 4001(b) and (c) [P-22] (ECF No. 196)
- B. W&T Offshore, Inc.'s Limited Objection to Debtors' Emergency Motion for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief (ECF No. 197)
- C. CETCO Energy Services Company, LLC's Amended and Restated Response to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) claims, and (II) Granting Related Relief (ECF No. 212)
- D. C-Dive L.L.C.'s Limited Response to Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay (A) Prepetition

Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) claims, and (II) Granting Related Relief (ECF No. 284)

- E. Oil States Energy Services LLC's Limited Response in Opposition to the Emergency Motion of Debtors to Pay Prepetition Interest Owner Obligations Joint Interest Billings, and E&P Operating Expenses and (B) 503(B)(9) Claims, and (II) Granting Related Relief (ECF No. 306)
- F. Limited Objection of the Official Committee of Unsecured Creditors to the Debtors' Emergency Motion for a Final Order (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims, and (II) Granting Related Relief (ECF No. 308)

Related Documents:

- A. Declaration of Michael Dane in Support of Debtors' Chapter 11 Petitions and First Day Relief (ECF No. 29)
- B. Affidavit of James Mapplethorpe Regarding First Day Motions, Orders, Prime Clerk Retention Application, Application for Designation as a Complex Chapter 11 Case, Emergency Consideration Request, Notice of Agenda, and Declaration of John-Paul Hanson and Michael Dane (ECF No. 44)
- C. Interim Order (I) Authorizing Debtors to Pay (A) Prepetition Interest Owner Obligations, Joint Interest Billings, and E&P Operating Expenses and (B) 503(b)(9) Claims; and (II) Granting Related Relief (ECF No. 62)
- D. Debtors' Witness and Exhibit List for Hearing on August 24, 2020 (ECF No. 193)
- E. W&T Offshore, Inc.'s Witness and Exhibit List for Hearing Scheduled for August 24, 2020 at 1:30 p.m. (ECF No. 195)
- F. Emergency Motion of Debtors for Entry of an Order Continuing the Hearing on the Motions (ECF No. 219)
- G. Order Continuing the Hearing on the Motions (ECF No. 221)
- H. Affidavits of Service for Mailings for the Period from August 16, 2020 through August 21, 2020 (ECF No. 268)
- I. Notice of Payment of Interest Owner Payments in Excess of Estimated Amount for Interim Period (ECF No. 314)
- J. Exhibit List Filed By Oil States Energy Services, LLC (ECF No. 315)

K. Witness and Exhibit List Filed by the Official Committee of Unsecured Creditors (ECF No. 317)

L. Debtors' Witness and Exhibit List for Hearing on September 14, 2020 (ECF No. 318)

5. **Motion of Regis Southern for Relief from the Automatic Stay to Permit Continuation of Personal Injury Litigation Pending in the U.S. District Court of the Western District of Louisiana (ECF No. 253)**

Status: This matter is contested and scheduled to be heard at the Hearing, but the objection deadline is September 16, 2020.

Related Documents:

A. Witness and Exhibit List filed by Regis Southern (ECF No. 319)

B. Witness and Exhibit List filed by The Official Committee of Unsecured Creditors (ECF No. 317)

C. Debtors' Witness and Exhibit List for Hearing on September 14, 2020 (ECF No. 318)

Dated: September 13, 2020
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that, on September 13, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez